

# **Exhibit A**

**Parties' Joint Proposed Questions**

Do you know anything about or have you ever worked at or with any of the following? Check all that apply.

Boies Schiller Flexner LLP

Google LLC

Morgan & Morgan PA

Quinn Emanuel Urquhart & Sullivan LLP

Susman Godfrey LLP

If any are checked, please explain:

Do you know any of the following people? Check all that apply.

Sammit Adhya

Jesse Adkins

On Amir

Alison Anderson

Josef Teboho Ansoorge

Rossana Baeza

Glenn Berntson

Deepti Bhatnagar

Chetna Bindra

David Boies

Amanda Bonn

Sabine Borsay

Stephen Broome

Chasom Brown

William Burck

William Byatt

Willian Byatt

Bill Carmody

Christopher Castillo

Stephen Chung

Jomaire Crawford

Ian Crosby

Jeremy Davis

Diane Doolittle

Greg Fair

Teuta Fani

Adrienne Porter Felt

Donald Seth Fortenbery

Alexander Frawley

Steve Ganem

Tracy (Xi) Gao

Ramin Halavati

Helen Harris

Marie Hayrapetian  
Jonathan Hochman  
Sara Jenkins  
Mark Keegan  
Michael Kleber  
Michael Lasinski  
James Lee  
Blake Lemoine  
Bert Leung  
Chris Liao  
Mandy Liu  
Many Liu  
Mark Mao  
AbdelKarim Mardini  
Joseph Margolies  
Jean Martin  
Rory McClelland  
Rachael McCracken  
Ryan McGee  
Keith Mitnik  
David Monsees  
Crystal Nix-Hines  
Alyssa Olson  
Chris Palmer  
Kostas Psounis  
Shawn Rabin  
Brian Rakowski  
Michael Ram  
Beko Reblitz-Richardson  
Aarti Reddy  
Caitlin Sadowski  
Andrew Schapiro  
Bruce Schneier  
Justin Schuh  
Paul Schwartz  
Martin Shelton  
Steven Shepard  
Ryan Sila  
Sonal Singhal  
Carl Spilly  
Bruce Strombom  
Parisa Tabriz  
Thao Thai  
Viola Trebicka  
Monique Trujillo  
Jonathan Tse

Lorraine Twohill  
Troy Walker  
Brett Watkins  
M. Logan Wright  
John Yanchunis  
Georgios Zervas

If any names are checked, please explain:

**Plaintiffs' Proposed Questions<sup>1</sup>**

How often do you use Google services like Gmail, Google Search, and Google News?

I do not know what these are.

I use one or more frequently.

I use one or more but not frequently.

I did use these in the past.

I have never used these.

For what purposes do you use Google? Please check all that apply.

I do not use Google.

Jobs (job search, job postings, etc.)

Health (medical issues, diagnosis, symptoms, treatment, etc.)

Wages, Finances

Entertainment, Sports

Weather, Travel, Maps

Definition of or translation of words, phrases, etc.

How often do you use the Incognito browsing mode?

I do not know what that is.

I use it frequently.

I use it but not frequently.

I did in the past.

I have never used it.

If you use or have ever used Incognito, please explain the most important reasons for which you use or have used it:

How often do you use a private browsing mode aside from Incognito?

I do not know what that is.

---

<sup>1</sup> **Google's Objection:** Google objects to Plaintiffs' proposed questions on the grounds that many of the proposed questions are designed to condition jurors, cause jurors to improperly personalize the case by considering what information they provide to Google or how they personally review Google's disclosures, improperly suggest that the case is class action when the jury will not be determining injunctive relief for the class, and/or are phrased too vaguely to yield useful information.

I use one frequently.

I use one but not frequently.

I did in the past.

I have never used one.

If you use or have ever used any private browsing mode, please explain the most important reasons for which you use or have used it:

Are you familiar with Google's CEO Sundar Pichai?

No

Yes. Please explain:

Do you pay attention to disclosures, announcements, and any other types of communications from Google when you are using Google services?

I do not use Google.

No

Yes. Please explain:

Do you have any education, training or work experience with business contracts?

No

Yes. Please explain:

Do you have any education, training, or work experience with computer coding?

No

Yes. Please explain:

What is your impression, opinion, or feeling about Google?

I do not know what that is.

Very positive

Positive

Neutral or no impression, opinion, or feeling

Negative

Very negative

Please explain:

What is your impression, opinion, or feeling about a person's right to privacy while using the internet?

It is important

It is not important

Please explain:

What is your impression, opinion, or feeling about someone who claims to have been harmed, but that harm is mental and not physical in nature?

I do not know what that is.

Very positive

Positive

Neutral or no impression, opinion, or feeling

Negative

Very negative

Please explain:

How would you describe your impression, opinion, or feeling about class action lawsuits?

Very positive

Positive

Neutral or no impression, opinion, or feeling

Negative

Very negative

Please explain:

Do you believe that lawsuits against large corporations are hurting our economy or our society?

No

Yes. Please explain:

Do you have any strong feelings about awarding money to individuals suing a large corporation in a civil lawsuit?

No

Yes. Please explain:

### **Google's Proposed Questions**

Do you or anyone close to you use private browsing modes when on the internet?

No

Yes. Please describe:

Have you or anyone close to you ever used Chrome Incognito?

No

Yes. Please describe:

Have you or anyone close to you ever been a member of a class action?

No

Yes. Please describe:

Have you or anyone close to you ever been part of a data breach?

No

Yes. Please describe:

Have you or anyone close to you ever been part of a privacy breach or had their identity stolen?

No

Yes. Please describe:

Have you or anyone close to you ever believed they had a claim for invasion of privacy?

No

Yes. Please describe:

Do you or anyone close to you have a strong opinion about large technology companies?

No

Yes/Self. Please describe:

Yes/Close Contact. Please describe:

Do you or anyone close to you have a strong opinion about Google?

No

Yes/Self. Please describe:

Yes/Close Contact. Please describe:

Do you or anyone close to you have a strong opinion about how Google handles user privacy?

No

Yes/Self. Please describe:

Yes/Close Contact. Please describe:

Do you, a family member, or someone close to you have expertise or had training, taken courses or worked in or around the following areas?

(drop down answers)

Law (Yes, self / Yes, family / Yes, someone close)

Privacy (Yes, self / Yes, family / Yes, someone close)

Technology (Yes, self / Yes, family / Yes, someone close)

Data Security (Yes, self / Yes, family / Yes, someone close)

Computer Programming (Yes, self / Yes, family / Yes, someone close)

Drafting or Negotiating Contracts (Yes, self / Yes, family / Yes, someone close)

Drafting Disclosures or Policies (Yes, self / Yes, family / Yes, someone close)

If Yes to any of the above, please explain:

Do you hold any leadership roles at work or in social groups?

No

Yes. Please describe:

Have you or anyone close to you served in the military?

No

Yes. Please describe: